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October 12, 2021

VIA ECF

United States District Court
Eastern District of New York
Attn: Hon. Eric Komitee, U.S.D.J.
225 Cadman Plaza East
Courtroom 6G North
Brooklyn, NY 11201-1804

Re: Williams v. The Russo's Payroll Group, Inc., et al.
Case No.: 1:21-cv-2922 (EK) (CLP)
MLLG File No.: 75-2021

Dear Judge Komitee:

This office represents Defendants The Russo's Payroll Group, Inc. d/b/a Russo's on the Bay (hereinafter the "Corporate Defendant"), Frank Russo, Jr. ("Frank"), and Giuseppe "Joe" Vacca¹ ("Giuseppe") (Frank and Giuseppe collectively hereinafter the "Individual Defendants") (the Corporate Defendant and the Individual Defendants collectively hereinafter the "Defendants") in the above-referenced case.

Defendants write to respectfully request a brief three (3) day extension of time of until Friday, October 15, 2021 to submit their moving papers in support of their motion to dismiss the complaint.

The reason for this request is because your undersigned is working to complete a Second Circuit appellate brief due today in another matter and thus needs additional time to submit the moving papers in this case. There have been no previous requests for an extension of this deadline. The adversary takes no position on Defendants' request, and Defendants do not object to a reciprocal extension of Plaintiff's deadline to submit opposition papers.

Accordingly, Defendants respectfully submit that they have established sufficient good cause for this Court to exercise its discretion in favor of granting the requested extension of time. See Fed. R. Civ. P. 6(B)(1)(A).

Defendants thank this honorable Court for its time and attention to this case.

¹ This office does not represent Defendant Robert Russo.

Dated: Lake Success, New York
October 12, 2021

MILMAN LABUDA LAW GROUP PLLC

_____/s_____
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